

EXHIBIT C
PROPOSED ORDER

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

LABATON SUCHAROW LLP

Thomas A. Dubbs (*pro hac vice*)
Carol C. Villegas (*pro hac vice*)
Michael P. Canty (*pro hac vice*)
Thomas G. Hoffman, Jr. (*pro hac vice*)
140 Broadway
New York, New York 10005

*Lead Counsel to Securities Lead Plaintiff and
the Class*

MICHELSON LAW GROUP

Randy Michelson (SBN 114095)
220 Montgomery Street, Suite 2100
San Francisco, California 94104

*Local Bankruptcy Counsel to Securities Lead
Plaintiff and the Class*

LOWENSTEIN SANDLER LLP

Michael S. Etkin (*pro hac vice*)
Andrew Behlmann (*pro hac vice*)
Scott Cargill
Colleen Restel
One Lowenstein Drive
Roseland, New Jersey 07068

*Special Bankruptcy Counsel to Securities
Lead Plaintiff and the Class*

(additional counsel on Exhibit A)

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

- and -

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

Case No. 19-30088 (DM) (Lead Case)

Chapter 11

(Jointly Administered)

**[PROPOSED] ORDER GRANTING
PERA'S MOTION FOR APPOINTMENT
AS LEAD PLAINTIFF AND APPROVAL
OF SELECTION OF LEAD COUNSEL**

1 Upon the motion, dated December 8, 2023, of PERA¹ for entry of an order, pursuant to the
2 prior determination of this Court to apply Rule 7023 to the Securities Claims, 11 U.S.C. § 105(a)
3 and Rules 9014(a) and (c) of the Federal Rules of Bankruptcy Procedure; and this Court having
4 jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and
5 1334, the Order Referring Bankruptcy Cases and Proceedings to Bankruptcy Judges, General Order
6 24 (N.D. Cal.), and Bankruptcy Local Rule 5011-1(a); and consideration of the Motion and the
7 requested relief being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper
8 before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found and
9 determined that notice of the Motion was reasonable and sufficient, and it appearing that no other or
10 further notice need be provided; and this Court having reviewed the Motion and held a hearing to
11 consider the Motion; and this Court having determined that the legal and factual bases set forth in
12 the Motion establish just cause for the relief granted herein; and it appearing that the relief
13 requested in the Motion is appropriate under the circumstances; and upon the record of all of the
14 proceedings had on the Motion before this Court, and after due deliberation and sufficient cause
15 appearing therefor,

16 **IT IS HEREBY ORDERED THAT:**

- 17 1. The Motion is granted as set forth herein.
- 18 2. The Court hereby finds that the factors enumerated in Federal Rule of Civil
19 Procedure 23(a)(3)-(4) are preliminarily satisfied as set forth in the Court's September 12, 2023 oral
20 ruling;
- 21 3. PERA is appointed Lead Plaintiff to represent the Proposed Class of Securities
22 Claimants; and
- 23 4. PERA's selection of counsel, Labaton Sucharow LLP, is approved as Lead Counsel.

24 ** END OF ORDER **

25

26

27

28 ¹ Capitalized terms used but not defined herein have the meanings given thereto in the Motion.